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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALFREDO ALVAREZ SANCHEZ,
RAUL MUNOZ NAVARRO,
INOSENCIO CRUZ

Defendants.

CASE NO. 1:24-CR-00305-JLT-SKO

STIPULATION AND ORDER REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT

STIPULATION

1. By previous order, this matter was set for status on October 15, 2025.
2. By this stipulation, defendants now move to continue the status conference until March 18, 2026, and to exclude time between October 15, 2025, and March 18, 2026, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes voluminous wiretap data, extractions of digital devices, photographs, videos, and over 83,000 pages of documents. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying. Supplemental discovery has also been produced.
 - b) Counsel for defendants desire additional time consult with their clients, to review

1 the current charges, to conduct investigation and research related to the charges, to review and
2 copy discovery, to discuss potential resolutions, to prepare pretrial motions, and otherwise
3 prepare for trial.

4 c) Counsel for defendants believe that failure to grant the above-requested
5 continuance would deny them the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of October 15, 2025 to March 18,
13 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
14 T4] because it results from a continuance granted by the Court at defendant's request on the basis
15 of the Court's finding that the ends of justice served by taking such action outweigh the best
16 interest of the public and the defendant in a speedy trial.

17 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
18 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
19 must commence.

20 IT IS SO STIPULATED.

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23 Dated: October 3, 2025

ERIC GRANT
United States Attorney

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25 /s/ ANTONIO PATACA
ANTONIO PATACA
26 Assistant United States Attorney
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1 Dated: October 3, 2025

/s/ CLEMENTE JIMENEZ
CLEMENTE JIMENEZ
Counsel for Defendant
RAUL NAVARRO

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4 Dated: October 3, 2025

/s/ MARK REICHEL
MARK REICHEL
Counsel for Defendant
ALFREDO ALVAREZ SANCHEZ

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9 Dated: October 3, 2025

/s/ TONI WHITE
TONI WHITE
Counsel for Defendant
INOSENCIO CRUZ

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13 **ORDER**

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15 In light of the Defendants arraignment on the 1st superseding indictment on March 24, 2025, the
16 parties' request to continue the status conference from October 15, 2025, to March 18, 2026, at 1:00
17 p.m. is GRANTED. Time is excluded through March 18, 2026, pursuant to 18 U.S.C. § 3161(h)(7)(A),
18 B(iv).

19 The parties shall be prepared to select a mutually agreeable trial date at the March 18, 2026,
20 status conference.

21
22 IT IS SO ORDERED.

23 Dated: October 8, 2025

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE